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VIA ECF

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-JS

Dear Special Master Vanaskie:

This letter is to provide Defendants' position with respect to the topic on the agenda for the Biweekly Teleconference with Your Honor on September 14, 2022. The parties do not expect the need to discuss any confidential materials as part of this agenda item.

Update on the Status of ZHP's Losartan/Irbesartan Core Discovery Production

The ZHP Defendants are in the process of complying with the Court's July 18, 2022 Core Discovery Order, [ECF No. 2132](#). The ZHP Defendants anticipate completing discovery within the timeframe of that Order with one exception. Despite best efforts, the ZHP Defendants will not be able to identify, scan, and prepare for production all nitrosamine testing results by the October deadline. Although the ZHP Defendants will have produced testing results for approximately 1,600 batches of US DMF API manufactured through 2018 by October, the ZHP Defendants are continuing to meet and confer with Plaintiffs' counsel regarding additional testing results. If the parties are unable to come to an agreement regarding the scope of the testing, the ZHP Defendants anticipate briefing this issue with the Court in advance of the next scheduled conference. To the



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extent the Court requires the ZHP Defendants to produce additional testing material, the ZHP Defendants will need more time – an additional 60 days beyond the October deadline – to complete production.

Respectfully submitted,

/s/ Lori G. Cohen

Lori G. Cohen

cc: Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)
Jessica D. Miller, Esq. (*via email, for distribution to Defendants' Counsel*)
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